

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Conditional Major Draft No. F-04-014

WEBASTO ROOF SYSTEMS, INC.

LEXINGTON, KY.

April 26, 2004

MARK LABHART, REVIEWER

Plant I.D. # 021-067-00157

Application Log # 56301

**SOURCE DESCRIPTION:**

Webasto's manufacturing operation in Lexington, Kentucky produces automobile sunroof systems. The existing facility's operations consist of sunroof glass priming, sealing and gasket attachment. Gaskets are attached to sunroofs manually using vibrating tools. Process emissions from the existing operations exit the facility through general ventilation. The source is adding a new sunroof glass encapsulation process, which will eliminate some manual labor associated with gasket attachment using the vibrating tools. The sunroof glass encapsulation units utilize a 2-part polyurethane. There will be four new emission points dedicated to sunroof glass encapsulation. Each of the four sunroof glass encapsulation emission points will serve six encapsulation presses. In addition, the source has insignificant activities related to equipment maintenance and repair, including minor welding, equipment cleaning and painting.

**COMMENTS:**

Regulation 401 KAR 59:010, New process operations is applicable.

Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances is applicable.

?? Two storage tanks are required for the polyurethane encapsulation process. Working and breathing losses associated with these tanks are negligible. The isocyanate tank and the polyol tank are both located indoors, organic compound vapor pressures are low ( $<0.8$  Pa @  $20^{\circ}\text{C}$ ), and turnover rates are low ( $<4.1$  per year).

?? There are negligible HAP emissions associated with the polyurethane usage, since these materials react in the process when the 2-part mixture is combined.

?? Volatile organic compound emissions were calculated from material balances.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

Webasto Roof Systems, Inc. has requested voluntary permit limits of less than 9.0 tons per year of individual hazardous air pollutants (HAP) and 22.5 tons per year of combined HAPs. Potential VOC emissions are 38.1 TPY. No Conditional Major limitations are required for VOC.

**OPERATIONAL FLEXIBILITY:**

Webasto Roof Systems is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.